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Attorneys for Plaintiff
(additional counsel information on next page)

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
SOUTHERN CALIFORNIA,
Plaintiff,

v.

UNITED STATES IMMIGRATION
AND CUSTOMS ENFORCEMENT,
UNITED STATES DEPARTMENT
OF HOMELAND SECURITY,

Defendants.

Case No. 2:22-CV-04760-SHK

**DECLARATION OF EUNICE H.
CHO IN SUPPORT OF
PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT AGAINST
DEFENDANT IMMIGRATION
AND CUSTOMS ENFORCEMENT**

Honorable Shashi H. Kewalramani
United States Magistrate Judge

1 EUNICE CHO (*pro hac vice*)
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4 NATIONAL PRISON PROJECT
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13 San Francisco, CA 94104
14 Telephone: (202) 393-4930

15 *Attorneys for Plaintiff*

1 I, Eunice H. Cho, declare as follows:

2 1. I am counsel for Plaintiff ACLU of Southern California in the above-
3 captioned matter. I submit this declaration in support of Plaintiff's Motion for
4 Summary Judgment against Defendant Immigration and Customs Enforcement
5 (ICE). I have personal knowledge of the facts set forth below, and if called as a
6 witness, I could and would competently testify thereto.

7 2. On February 19, 2025, Defendants' counsel Joseph Tursi sent
8 Plaintiffs' counsel a letter and Search Summary for this case via email. Attached
9 hereto as Exhibit A is a true and correct copy of that letter and Search Summary.

10 3. On December 11, 2024, Defendants' counsel Joseph Tursi sent the
11 Court and counsel in this case an email regarding this case. Attached hereto as
12 Exhibit B is a true and correct copy of that email. Mr. Tursi also included as an
13 attachment to that email a letter dated December 11, 2024. Attached hereto as
14 Exhibit C is a true and correct copy of that letter.

15 4. On November 19, 2024, Defendants' counsel Joseph Tursi sent
16 Plaintiffs' counsel an email regarding this case. Attached hereto as Exhibit D is a
17 true and correct copy of that email.

18 5. On January 22, 2024, Defendants' counsel Joseph Tursi sent Plaintiffs'
19 counsel a letter regarding this case via email. Attached hereto as Exhibit E is a true
20 and correct copy of that letter.

21 6. On January 17, 2024, Defendants' counsel Joseph Tursi sent Plaintiffs'
22 counsel a letter regarding this case via email. Attached hereto as Exhibit F is a true
23 and correct copy of that letter.

24 7. On December 21, 2023, my co-counsel, Kyle Virgien, sent
25 Defendants' counsel a letter via email, on which I was copied. Attached hereto as
26

1 Exhibit G is a true and correct copy of that letter.

2 8. On December 13, 2023, my co-counsel, Laboni Hoq, sent Defendants'
3 counsel a letter via email, on which I was copied. Attached hereto as Exhibit H is a
4 true and correct copy of that letter.

5 9. On November 30, 2023, Defendants' counsel Joseph Tursi sent
6 Plaintiffs' counsel a letter regarding this case via email. Attached hereto as Exhibit
7 I is a true and correct copy of that letter.

8 10. On November 9, 2023, my co-counsel, Laboni Hoq, sent Defendants'
9 counsel a letter via email, on which I was copied. Attached hereto as Exhibit J is a
10 true and correct copy of that letter.

11 11. On November 2, 2023, Defendants' counsel Joseph Tursi sent
12 Plaintiffs' counsel a letter regarding this case via email. Attached hereto as Exhibit
13 K is a true and correct copy of that letter.

14 12. On October 10, 2023, Defendants' counsel Joseph Tursi sent
15 Plaintiffs' counsel a letter regarding this case via email. Attached hereto as Exhibit
16 L is a true and correct copy of that letter.

17 13. On September 14, 2023, my co-counsel, Laboni Hoq, sent Defendants'
18 counsel a letter via email, on which I was copied. Attached hereto as Exhibit M is a
19 true and correct copy of that letter.

20 14. On September 1, 2023, Defendants' counsel Joseph Tursi sent
21 Plaintiffs' counsel a letter regarding this case via email. Attached hereto as Exhibit
22 N is a true and correct copy of that letter.

23 15. On July 12, 2023, my co-counsel, Laboni Hoq, sent Defendants'
24 counsel a letter via email, on which I was copied. Attached hereto as Exhibit O is a
25 true and correct copy of that letter.

1 16. On June 26, 2023, my co-counsel, Laboni Hoq, sent Defendants’
2 counsel a letter via email, on which I was copied. Attached hereto as Exhibit P is a
3 true and correct copy of that letter.

4 17. On June 22, 2023, Defendants’ counsel Joseph Tursi sent Plaintiffs’
5 counsel a letter regarding this case via email. Attached hereto as Exhibit Q is a true
6 and correct copy of that letter.

7 18. On June 12, 2023, my co-counsel, Laboni Hoq, sent Defendants’
8 counsel a letter via email, on which I was copied. Attached hereto as Exhibit R is a
9 true and correct copy of that letter.

10 19. On June 1, 2023, my co-counsel, Laboni Hoq, sent Defendants’
11 counsel a letter via email, on which I was copied. Attached hereto as Exhibit S is a
12 true and correct copy of that letter.

13 20. On May 19, 2023, my co-counsel, Laboni Hoq, sent Defendants’
14 counsel a letter via email, on which I was copied. Attached hereto as Exhibit T is a
15 true and correct copy of that letter.

16 21. On March 29, 2023, Defendants’ counsel Joseph Tursi sent Plaintiffs’
17 counsel a letter regarding this case via email. Attached hereto as Exhibit U is a true
18 and correct copy of that letter.

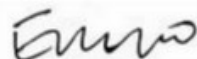
19 22. Attached hereto as Exhibit V is a true and correct copy of documents
20 produced by Defendants in response to Plaintiff’s FOIA request. These documents,
21 marked with Bates numbers 13389, 13390, and 13389.1-19, reflect an email
22 document with the subject line “FW: VARGAS-Arellano, Martin, A205 718 808”
23 and an attached Powerpoint presentation with the title “ERO Domestic Operations.”

24 23. Attached hereto as Exhibit W is a true and correct copy of a document
25 produced by Defendants in response to Plaintiff’s FOIA request. These documents,
26

1 marked with Bates numbers 24-CRLI-0005-000063-85, include a memorandum
2 from Dana Sanvano-Dunn to Tae D. Johnson, regarding the Adelanto Processing
3 Center, as well as an email sent on August 16, 2021, titled “CRCL Investigation at
4 the Adelanto ICE Processing Center.”

5
6 I declare under penalty of perjury under the laws of the United States of America
7 that the foregoing is true and correct.

8
9 Executed on February 26, 2025, at Silver Spring, Maryland.

10 
11 _____
Eunice H. Cho